



Compliance Policy

Sandler Group Guidelines on Gifts and Hospitality



Dear Business Partner,

At Sandler Group, we believe that integrity is the foundation of strong and lasting business relationships. A careful and transparent approach to gifts, invitations, and similar courtesies helps protect all parties from any appearance of impropriety and reinforces our shared commitment to ethical conduct.

To that end, we kindly ask that you observe the following guidelines when interacting with employees of the Sandler Group:

- **Gifts and Benefits**
Please refrain from offering any gifts or other items of monetary value to Sandler Group employees.
- **Business Meals**
Paying for a meal with Sandler Group employees (or allowing them to pay for you) may be acceptable if the meal is shared in person, the purpose is clearly business-related, and the cost is reasonable. Such occurrences should remain occasional.
- **Prospective Business Partners**
If you are not yet in a business relationship with the Sandler Group, we kindly ask that you do not offer to pay for meals involving our employees.
- **Entertainment, Travel, and Accommodation**
We ask that you do not cover the cost of entertainment, travel, or accommodation for Sandler Group employees under any circumstances.

Please know that our intention in adhering to these principles is not to appear ungracious. Rather, it reflects our commitment to maintaining professional boundaries and ensuring that our decisions remain unbiased and transparent.

If you have any questions regarding these expectations, please do not hesitate to contact your Sandler Group representative or reach out to our Human Rights Officer, Jeannette Jaschkowitz, at Jeannette.Jaschkowitz@sandler-group.com.

Thank you for your understanding and for your continued partnership.